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BY ECF & EMAIL
Hon. Loretta A. Preska
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

The request to reappoint Mr. Womble and Ms. Bennett as CJA counsel to Mr. Khurtsidze to file a motion for compassionate release and an alternative motion for reduction of sentence is GRANTED. Appointment is made nunc pro tunc from December 9, 2020.

Re: *United States v. Avtandil Khurtsidze*
17 Cr. 350 (LAP)

Loretta A. Preska 2/11/2021

Dear Judge Preska:

I write on behalf of Avtandil Khurtsidze, currently incarcerated at Loretto, Pennsylvania. The BOP reports that over 700 inmates at Loretto have tested positive for COVID since the beginning of the pandemic.

I, along with co-counsel Megan Bennett, represented Mr. Khurtsidze in the above-referenced matter pursuant to Criminal Justice Act 18 U.S.C. §3006A, from the inception of his case through sentencing. Mr. Khurtsidze was sentenced to 10 years incarceration by Judge Katherine B. Forrest in September 2018.

I respectfully request CJA reappointment for Ms. Bennett and myself to allow us to submit a motion requesting compassionate release, as well as a motion requesting, in the alternative, a reduction to Mr. Khurtsidze's sentence pursuant to *United States v. Brooker*, No. 19-3218, WL 5739712 (2d Cir. Sept. 25, 2020). Should the Court grant this request, I would ask that reappointment be ordered *nunc pro tunc* from December 9, 2020, the date that we filed a petition for his compassionate release or a reduction of his sentence directly with the warden of FCI Loretto. We have remained in contact with Mr. Khurtsidze since that date monitoring his health as well as the conditions of his confinement at FCI Loretto.

Thank you for your consideration of this request.

Respectfully Submitted,

Ken Womble

Ken Womble
Zeman & Womble, LLP

Cc: AUSA Andrew Adams